- 3. The 60-day extension of time requested herein is necessary due to the complexity of the case. There are approximately 115 unsecured creditors. The Debtor services multiple loans and manages a number of limited liability companies. Essentially the plan will revolve around collection of servicing fees and the sale of properties. The Debtor is in the process of formulating projections which will be the basis fo the plan. Debtor is proceeding diligently in its efforts, and believes it will be able to formulate an acceptable plan of reorganization within the extension of time requested herein.
- 4. The request set forth herein is Debtor's first request for an extension of time in which to file a plan. It is believed that an extension of 60 days to file the plan will be necessary. Debtor would also request an extension of the exclusivity period to obtain confirmation of his filed plan of reorganization. Section 1121(d) of the Bankruptcy Code authorizes the Court to grant an extension of the exclusive time period for filing and obtaining confirmation of a debtor's plan, assuming cause is shown therefor. Debtor believes that cause is indicated.

WHEREFORE, Debtor respectfully requests this Court enter its Order extending the 120-day exclusive time period to file his plan of reorganization, more specifically, from July 12, 2011, to and including September 12, 2011, and further that a 60-day extension also be granted for the corresponding exclusive period for obtaining confirmation of Debtor's filed plan of reorganization.

**DATED** this 11<sup>th</sup> day of July, 2011.

LAW OFFICES OF ALAN R. SMITH

/s/ Alan R. Smith ALAN R. SMITH, ESO. Attorney for Debtor

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